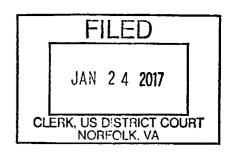
IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA



Norfolk Division

| UNITED STATES OF AMERICA |) | CRIMINAL NO. 2:19cr4 |
|--------------------------|--------|---|
| v. |) | 16 U.S.C. §§ 3372 and 3373 Lacey Act Trafficking |
| TOMMY WATER ZHOU, |) | (Count 1) |
| Defendant | , , | |

CRIMINAL INFORMATION

The United States Attorney and Assistant Attorney General for the Environment and Natural Resources Division of the Department of Justice charge that:

COUNT ONE

Between on or about March 21, 2013, and on or about April 9, 2013, in the Eastern District of Virginia and elsewhere, the defendant, TOMMY WATER ZHOU, knowingly engaged in conduct that involved the sale and purchase of, the offer of sale and purchase of, and the intent to sell and purchase wildlife, that is, juvenile American eels ("elvers"), with a market value in excess of \$350, and knowingly transported such wildlife in interstate commerce between Virginia and Maine, knowing that such wildlife was taken, possessed, transported, and sold in violation of and in a manner unlawful under the regulations of Virginia, specifically Title 4, Virginia Administrative Code, 20-500-40, and Title 4, Virginia Administrative Code, 20-500-35.

(In violation of Title 16, United States Code, Sections 3372(a)(2)(A) and 3373(d)(1)(B); and Title 18, United States Code, Section 2.)

DANA J. BOENTE United States Attorney

Date: 1/24/17

Joseph L. Kosky

Assistant United States Attorney
Attorney for the United States
United States Attorney's Office
101 West Main Street, Suite 8000
Norfolk, Virginia 23510
Office Number (757) 441 6331
Facsimile Number (757) 441-6689
E-Mail Address - joseph.kosky@usdoj.gov

JOHN C. CRUDEN
Assistant Attorney General
Environment and Natural Resources Division
United States Department of Justice

Date: 1/9/17

Shane N. Waller

Trial Attorney

Environment and Natural Resources Division

United States Department of Justice

601 D. Street, NW

Washington, D.C. 20579

Office Number (202) 305-0362

Facsimile Number (202) 514-8865

E-Mail Address - shane.waller@usdoj.gov

Cassandra Barnum

Trial Attorney

Environment and Natural Resources Division

United States Department of Justice